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*Attorney for Defendant, Adam Khimji*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 (San Francisco)**

VISUAL SUPPLY COMPANY, a  
 Delaware corporation,

Plaintiff,

vs.

ADAM K HIMJI, an individual and DOES 1 )  
 through 20, inclusive, )

Defendants. )

) Case Number: 3:24-cv-09361-WHO  
 ) **[PROPOSED] ORDER FOR**  
 ) **SANCTIONS**

) **Judge:** Senior District Judge William H.  
 ) Orrick

Before the Court is the Defendant Mr. Adam Khimji’s motion for sanctions against the Plaintiff, Visual Supply Company. The Court hereby grants the motion on the following terms.

- a. the subpoenas issued in *IN RE: DMCA SECTION 512(h) SUBPOENA TO (1) CLOUDFLARE, INC.; (2) PATREON, INC.; and (3) NAMESILO, L.L.C.* (Case No: 3:24-mc-80159-SK) are quashed with prejudice;
- b. **[Option A]** the Complaint in this file be dismissed with prejudice against Mr. Adam Khimji;
- c. **[Alternative to Option A]** Mr. Khimji be removed as a Defendant with prejudice, striking any references to his name from the Complaint, striking

1 para. 8 of the Complaint entirely, and expunging references to Mr. Khimji in  
2 the court file.

3 d. reasonable attorney's fees and costs for this motion for sanctions and  
4 defending this case, and such proof be filed within 14 days; and

5 e. that the Plaintiff shall pay a fine of \$10,000 into Court within thirty days.

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7 **IT IS SO ORDERED.**

8 Dated: \_\_\_\_\_

9 \_\_\_\_\_  
10 WILLIAM H. ORRICK  
11 United States District Judge  
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